

For this reason, the Commission should not require that wireless microphones that can operate on permissible frequencies be scrapped.

CONCLUSION

For the foregoing reasons, Sennheiser requests that the Commission allocate two blocks of separated, clean UHF spectrum for hyper-critical wireless microphone use. The Commission should not relax white space device rules when doing so will impede the operations of wireless microphones. Additionally, the Commission should regulate wireless microphones separately from white space devices, refraining from requiring white space database registration and control and other technical rules imposed on white space devices.

Respectfully submitted,



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February 4, 2015

ATTACHMENT TO PART 15 COMMENTS

PMSE System Operation in the 800 MHz LTE Duplex Gap

**Findings from the coexistence measurements in Ispra,
13-15 November 2013**

European Commission

Joint Research Centre

February 2014

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Summary

In this report the results of a study of a possible coexistence scenario for professional wireless audio systems, commonly referred to as PMSE (Programme Making and Special Events) systems, and broadband Mobile and Fixed Communication Networks (MFCN) are presented.

In the course of spectrum harmonization for the digital dividend in the European Union spectrum previously used by PMSE services was reassigned so that new spectrum suitable for these services had to be found. CEPT identified the bands 821-832 MHz and 1785-1805 MHz as potential candidates and defined technical conditions for the operation of PMSE in these bands which represent duplex gaps in existing LTE FDD systems.

Conditions for the coexistence of LTE and PMSE operating in the LTE duplex gap had been studied by a number of parties, with rather diverging results. On request of DG CNECT the JRC performed an analysis of the various studies and their discrepancies. Subsequently, DG CNECT suggested the deployment of LTE small cells in combination with LTE inter-band handover as a potential means to avoid or reduce interference from LTE to PMSE and requested the JRC to study the feasibility of this approach.

Using small cells might prevent harmful interference in indoor scenarios (e.g. theatres, musicals and live performances), which were identified as the most critical cases in terms of interference when LTE equipment and wireless audio PMSE equipment operate in close proximity. The basic idea is to steer away LTE uplink (terminal) traffic from the 832-862 MHz band (used in the macro cell) to the 2.6 GHz band (used in the small cell) and thus prevent adjacent channel interference to PMSE systems operating in the 821-832 MHz band (commonly referred to as the LTE duplex gap).

In response to the request from DG CNECT the JRC arranged a measurement campaign at its Ispra premises in November 2013, involving stakeholders from the PMSE community, mobile operators, and test equipment manufacturers. During four days, various PMSE systems and LTE terminals were tested and several Terabytes of measurement data were recorded. Preliminary results were presented at the RSC meeting #46 in December 2013. Observations made during the tests and the initial analysis of the measurement data confirmed that LTE Out-of-Band (OBB) interference can negatively affect the performance of both analogue and digital PMSE systems operating in the 800 MHz LTE duplex gap, with OBB emissions varying significantly between LTE User Equipment (UE) models.

An analysis of the inter-band handover process showed that if the handover from the 800 MHz band to the 2.6 GHz band was executed at a sufficiently early stage, i.e. before the LTE UE came too close to PMSE receiver, no harmful interference in the LTE duplex gap could be observed.

During the start-up test, i.e. when the LTE UE - while being within the coverage area of a local 2.6 GHz small cell and a distant 800 MHz macro cell - was switched on in close distance from the PMSE receiver, it was found that the LTE UE reliably connected to the LTE small cell base station, and no harmful interference in the 821-832 MHz duplex gap could be observed during the entire connection process.

The conclusion from the results of the LTE – PMSE coexistence measurements is that from a technical standpoint the use of LTE small cells in combination with inter-band handover can protect PMSE systems operating in the 800 MHz duplex gap. It is hypothesized that this conclusion will also hold for the 1800 MHz duplex gap.

Introduction

This report addresses the potential use of the 821-832 MHz band by Programme Making and Special Events (PMSE) equipment and specifically by wireless audio systems.

The 821-832 MHz band is generally referred to as 'LTE duplex gap' because it separates the downlink (DL) and uplink (UL) channels of LTE band no. 20 (further on referred to as the 800 MHz band). Wireless microphone channels typically occupy a bandwidth of up to 200 kHz for analogue systems [1] and 600 kHz for digital systems [2] so that in theory up to 55, resp. 18 such channels could fit into the duplex gap. Due to intermodulation effects, however, the actual number of usable channels is considerably lower.

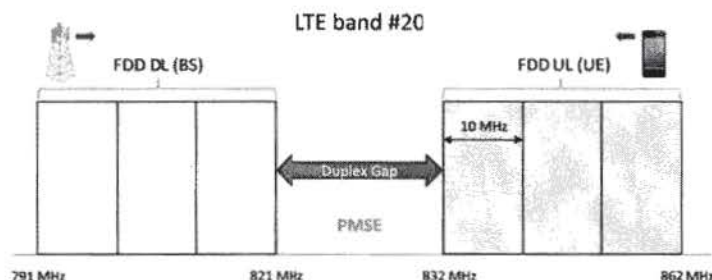


Figure 1: Concept of PMSE system operation in the 800 MHz LTE duplex gap

Technical conditions for the use of the 790-862 MHz range, and specifically of the 821-832 MHz LTE duplex gap by wireless microphones have been defined in decision ECC/DEC(09)03 [8] of the European Communications Committee (ECC) and Report 50 [3] of the European Conference of Postal and Telecommunications Administrations (CEPT).

Nevertheless, the suitability of these bands for PMSE was and still is controversially discussed because of the out-of-band (OOB) emissions from LTE base stations (BS) and user equipment (UE) that might create interference to PMSE receivers.

Previous studies

In 2012 and 2013 a number of studies were conducted with the objective to identify potential interference conditions and to quantify protection criteria for PMSE systems.

Measurements were conducted by the German Institut fuer Rundfunktechnik (IRT) [4], the Association of Professional Wireless Production Technologies (APWPT) [5], the Norwegian Post and Telecommunications Authority [6], the German Bundesnetzagentur (BNetzA) [7], and the United Kingdom's Ofcom [8] [9].

While all studies concluded that a potential for interference from LTE to PMSE systems exists, originating particularly from LTE UE, there was no consensus on the severity of the interference and the resulting protection criteria, owing to the lack of a common set of assumptions.

Interference avoidance through LTE inter-band handover

In July 2013, DG CNECT suggested to the JRC to evaluate a technical solution that might potentially resolve the interference issue by dynamically transferring LTE connections from the 800 MHz band to a different frequency range sufficiently distant from the 821-832 MHz duplex gap, namely the 2500-2690 MHz band (LTE band no. 7, further on referred to as the 2.6 GHz band). Local coverage in this band would be provided by one or more small cells.

Small cells come in a number of variants (Table 1) which address different deployment needs. Dense deployments in locations such as concert halls, theatres, and stadiums are typically realised with pico and femto cells. The capacity values provide below are indicative and based on industry estimates. The actual number of users that can be served within a cell depends on the type of services to be offered (which determines the bandwidth allocated to each user) and on the RF characteristics of the location such as interference and propagation conditions.

Cell type	Typical cell radius	Transmit power range & Typical value	Deployment location	Capacity (no. of users)
Macro	>1 km	20 W - 160 W (40 W)	Outdoor	>256
Micro	250 m - 1 km	2 W - 20 W (5 W)	Outdoor	64 - 256
Pico	<100 m	100 mW - 250 mW	Indoor	16 - 64
	100 m - 300 m	1 W - 5 W	Outdoor	16 - 64
Femto	10 m - 50 m	10 mW - 250 mW	Indoor	8 - 16
		200 mW - 1 W	Outdoor	8 - 32

Table 1: Typical LTE cell types and their characteristics [10] [11]

It should be mentioned that a potential alternative to small cells comes in the form of distributed antenna systems (DAS) which can be deployed indoors but are part of the macro network. A description of the DAS concept can be found in [12]. A second alternative could be Local IP Access (LIPA). Introduced in 3GPP rel. 9 and defined in 3GPP TR 23.829 [13], LIPA provides seamless interworking between LTE and WiFi. Data traffic can be offloaded to WiFi while time-critical services, such as VoIP continue to be delivered via LTE.

Within the scope of this report the actual implementation of the small cell network is of secondary importance. For reasons of simplicity the terms "picocell" and "pico base station" will be used further on in the text whenever a reference to small cells is made.

In the current coexistence scenario which has been thoroughly evaluated in the aforementioned studies, an LTE UE operates close to a PMSE receiver while being connected to a remote LTE macro BS (Figure 2). The attenuation of the signal path typically is high, due to distance, building loss, and other factors so that the LTE UE transmits at high power. Consequently, the level of the LTE signal received by the PMSE receiver is high, as well. As a result, the signal of the wireless microphone may be interfered.

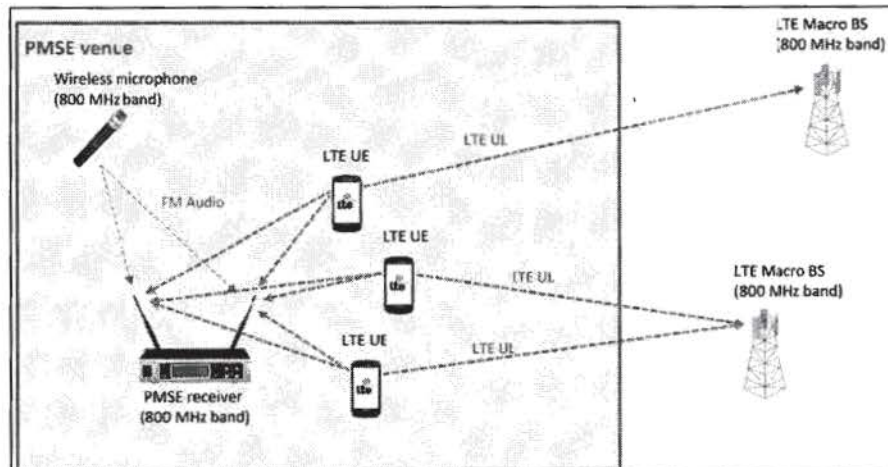


Figure 2: Current PMSE-LTE coexistence scenario

In the proposed scenario, a LTE pico BS would be set up in the vicinity of the PMSE receiver. An LTE UE located in the area of the PMSE receiver would receive a weak signal from the macro BS and a considerably stronger signal from the pico BS. Before generating interference at the PMSE receiver the LTE UE would have connected to the pico BS in the 2.6 GHz band and evacuated the critical 800 MHz band (Figure 3).

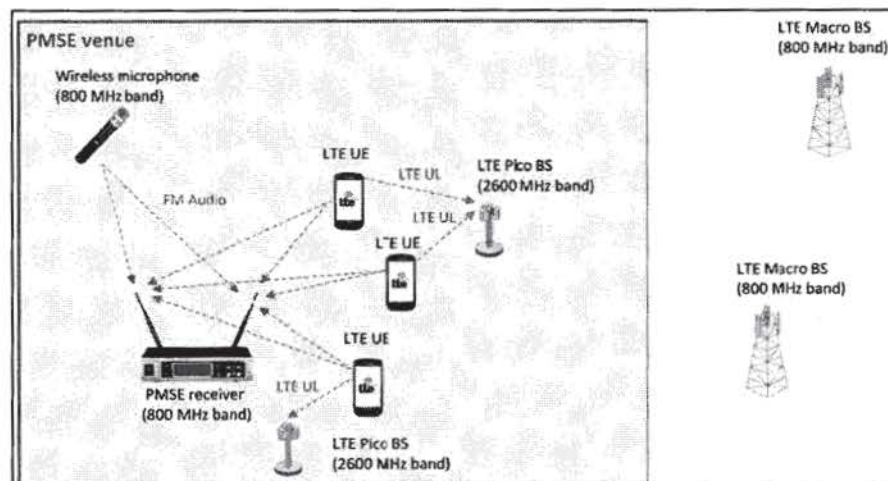


Figure 3: Potential future PMSE-LTE coexistence scenario

Evaluation - Test and measurement event

To evaluate whether the deployment of LTE picocells operating in the 2.6 GHz band can protect PMSE systems operating in the 821 - 832 MHz LTE duplex gap a test and measurement event with industry experts was organised by the JRC.

The measurements were conducted between November 13 and 15, 2013 at the JRC premises in Ispra, Italy. Among the participants were representatives of leading PMSE manufacturers AKG, Sennheiser, and Shure, the APWPT, the GSM Association (GSMA), test equipment manufacturers, and the JRC.



Test Cases

For the measurements two test cases were considered, the "In-operation" case and the "Start-up" case. A third test case to evaluate potential interference effects caused by intermodulation was added on request of the APWPT.

1. In operation

This test case simulated an LTE UE operating in the 800 MHz band that approached the PMSE receiver and LTE pico BS while transmitting data to a macro BS. The test was conducted in two steps:

In step 1 the impact of LTE UL OOB emissions on PMSE systems operating at various frequencies within the LTE duplex gap was determined. There was no LTE handover.

In step 2 a handover of the LTE connection from the 800 MHz band to the 2.6 GHz band was initiated at a certain point in time. The detailed scenario is as follows:

- A PMSE system consisting of a wireless microphone and a receiver is operating in the 821-832 MHz LTE duplex gap.
- An LTE macro BS operating in the 800 MHz band (LTE band 20) is located outside the venue.
- An LTE pico BS operating in the 2.6 GHz band (LTE band 7) is located in the vicinity of the PMSE receiver.
- In a distance d_1 from the PMSE receiver an LTE UE operating in the 800 MHz band is uploading data to the network via the macro BS.
- While connected to the LTE macro BS, the LTE UE moves towards the PMSE receiver and the LTE pico BS up to a minimum distance of $d_{2, \min}$ and $d_{3, \min}$, resp.
- At a certain distance d_3 , which corresponds to a predefined LTE transmit power level received by the LTE pico BS, the LTE UE connection is transferred from the macro BS to the pico BS while the LTE UE continues uploading data to the network.

The threshold value at which the handover occurred was variable.

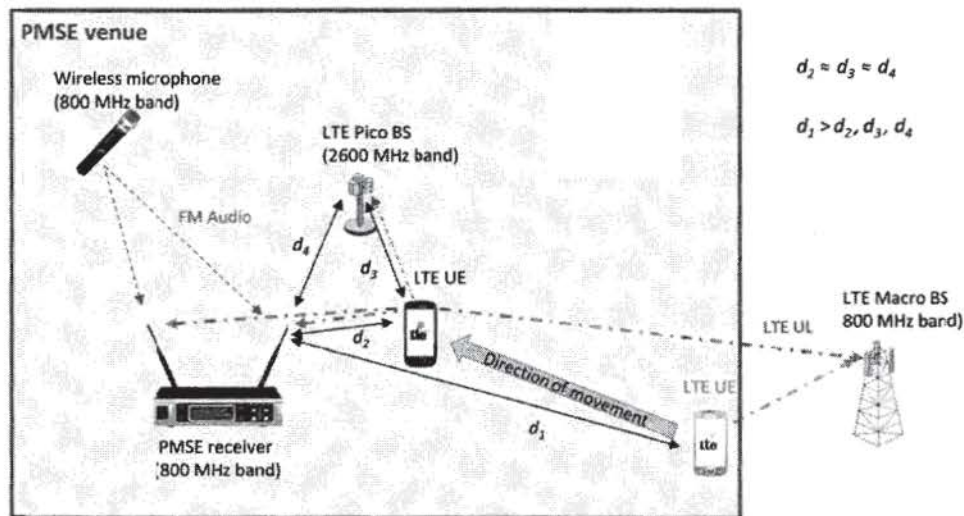


Figure 4: In-operation case

3. Dual-band PMSE

In this scenario two PMSE systems were operating simultaneously, one in the 821-832 MHz band and the other in the 1800 MHz band. An LTE UE operating in the vicinity of both PMSE receivers was repeatedly transferred from the 800 MHz band to the 2.6 GHz band and back. The detailed scenario is as follows:

- A PMSE system (wireless microphone and receiver) is operating in the 821-832 MHz LTE duplex gap.
- At the same time a second PMSE system is operating in the 1800 MHz band.
- An LTE macro BS operating in the 800MHz band is located outside the venue.
- An LTE pico BS operating in the 2600MHz band is located in the vicinity of both PMSE receivers.
- An LTE UE operating in the 800MHz band is located in a close distance from both PMSE receivers.
- The LTE UE is repeatedly transferred from the 800 MHz band to the 2.6 GHz band and back..
- The audio signal of the 1800 MHz PMSE systems is monitored for interference.

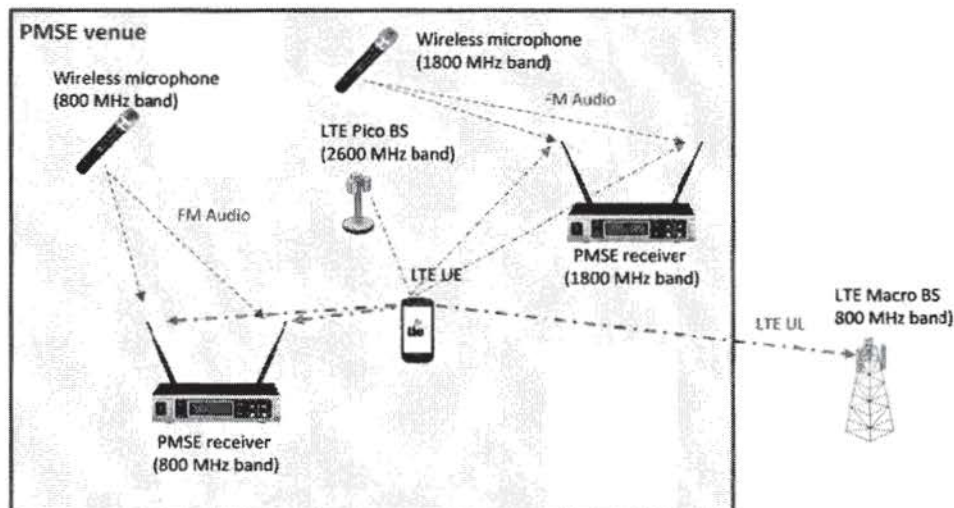


Figure 6: LTE UE transmitting in the vicinity of two PMSE systems operating in the 800 MHz and 1800 MHz bands

Test Setup

In order to reduce unwanted/uncontrollable interference effects and to make results more easily comparable with those of previous studies the measurements were performed in conducted mode.

The most critical elements of the setup were the LTE macro and pico base stations. While there had been several options for realising the LTE base station functionality it was eventually decided to use the R&S CMW500 LTE BS emulator, for the following reasons:

- Established and recognised LTE test platform.
- Full control of network parameters.
- Support for multi-network handover.
- Two independent networks can be emulated with one unit.
- Conducted tests are possible.
- Already used in the APWPT/IRT measurements. UL traffic configuration exists.
- Results can easily be compared to those of the IRT measurements.

In order to create a realistic interference scenario commercially available LTE USB modems and smartphones were used for LTE UE.

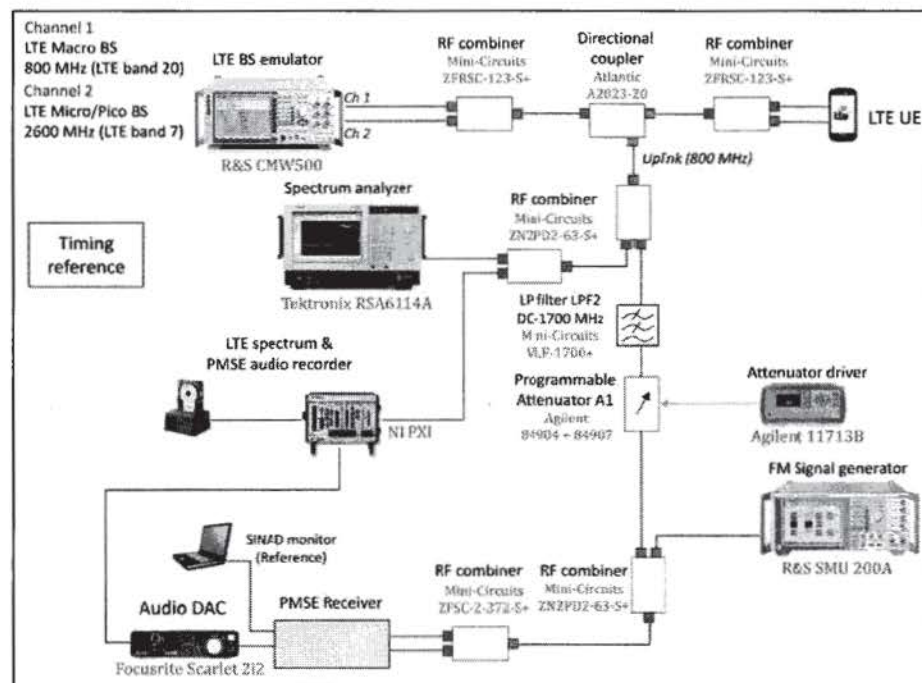


Figure 7: Test setup for analogue PMSE systems and LTE UE with antenna connectors

The LTE UE was connected with both base stations via two RF combiners and a directional coupler. The attenuation on these paths was maintained constant during the measurements. Initially, it had been foreseen to simulate an LTE UE moving towards both PMSE receiver and pico BS which would

have required varying the path attenuation between LTE UE and LTE pico BS. This variation, however, caused the connection between LTE UE and pico BS to become unstable; for this reason the above setup was adopted.

As the LTE uplink (UL) signal is the major cause of interference within the LTE duplex gap this signal was coupled out via a directional coupler. It was then distributed to a spectrum analyser (for monitoring purposes), to the PXI (for analysis, display and recording), and to a 1700 MHz low-pass filter. The purpose of this filter was to isolate the PMSE receiver from the relatively high-power 2.6 GHz LTE signal. The filtered signal then entered a programmable attenuator (A1).

For the in-operation test the movement of the LTE UE towards the PMSE receiver was simulated with the help of this attenuator which covered the range from 0 to 81 dB in steps of 1 dB. At A1 = 0 dB the overall path attenuation between LTE UE and PMS receiver was 42 dB, corresponding to a line-of-sight (LOS) distance of 3.6 meters. The attenuation was controlled from a PC (not shown above) that also managed the LTE handover and the data recording processes and served as a timing reference for the other components of the test setup (BS emulator, spectrum analysers, signal generators, PCs).

Finally, the LTE UL signal was inserted into the PMSE signal path. When analogue PMSE receivers were tested, the PMSE test signal was generated by an R&S MU200A signal generator. The composite PMSE-LTE signal was then fed the PMSE receiver. It was found that the operational stability of some receivers was improved by connecting both antenna inputs. This setup was maintained throughout the measurements and applied to all receivers.

One of the PMSE receiver audio outputs was connected to a high-definition audio analogue-to-digital converter (ADC) whose output signal was fed into a National Instruments PXI system which served as a real time spectrum analyser, audio signal-to-noise-and-distortion-ratio (SINAD) analyser, signal monitor, RF signal analyser, and RF and audio data recorder.

The second audio output was connected to a notebook PC running the ComTekk SINAD analysis software [13]. The ComTekk software had been used in previous measurement such as the one at IRT [4] to determine SINAD reference levels.

SINAD is a parameter for measuring the quality of an audio signal originating from a communication device. For a radiocommunication system this is usually done by transmitting an FM signal modulated at 1 kHz and with a specified deviation to the receiver. At the receiver's audio output the 1 kHz tone plus noise and distortion products will be present.

To measure the SINAD this audio signal is first passed through a filter which restricts the bandwidth of the signal to the important range around 1 kHz. In the ComTekk software a C-Message filter has been implemented. The filtered audio signal is measured and then passed through a notch filter which removes the 1 kHz tone. The resulting signal which consists of noise + distortion only is then measured and compared with the first measurement. The ratio is the SINAD value¹.

For LTE UE without antenna connectors the modified test setup shown in Figure 8 was used. The LTE UE was placed in an RF test fixture (antenna coupler) whose output was connected to the directional coupler.

¹ Adapted from [18]

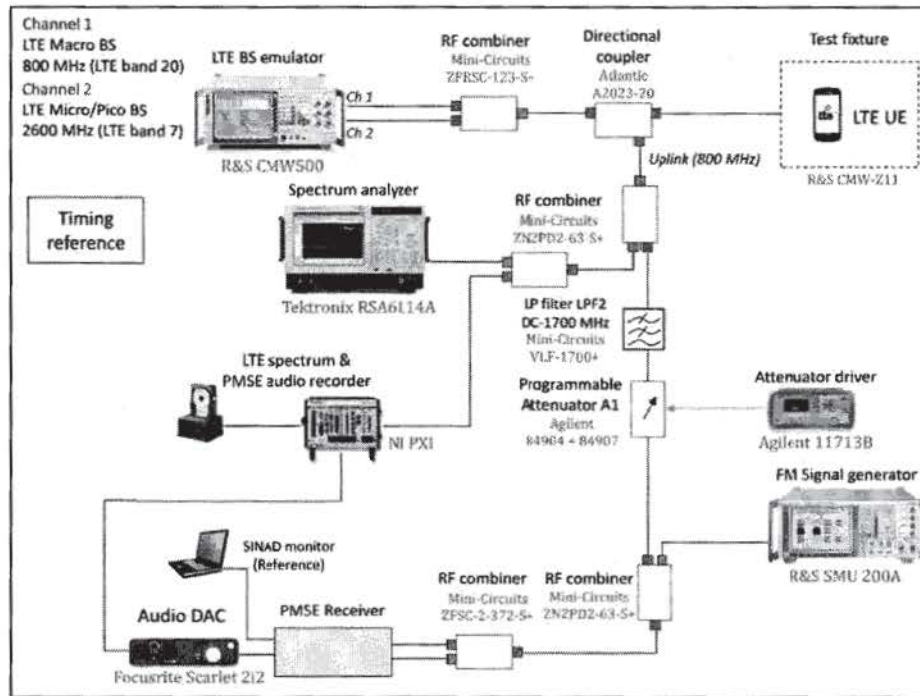


Figure 8: Test setup for analogue PMSE systems and LTE UE without antenna connectors

The digital PMSE systems that were tested used proprietary RF signals so that the test signal had to be generated by the respective PMSE transmitter. The test signal level was adjusted with variable attenuator A2. To avoid coupling from the transmitter's antennas into the PMSE receive path the transmitter was placed in an RF test fixture (Figure 9).

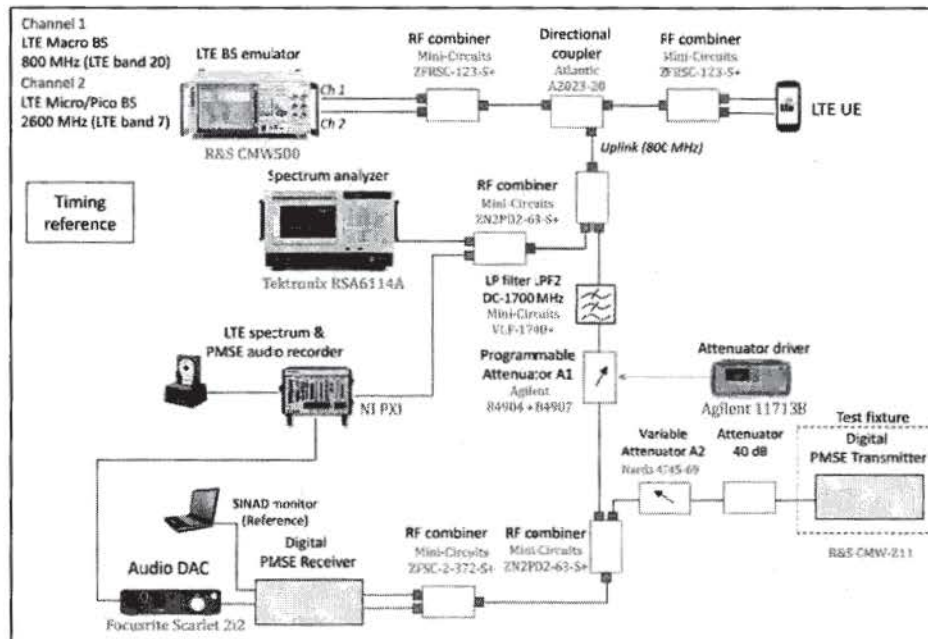


Figure 9: Test setup for digital PMSE systems

For the dual-band PMSE measurements an 1800 MHz signal generator and PMSE receiver were added to the PMSE signal path (Figure 10).

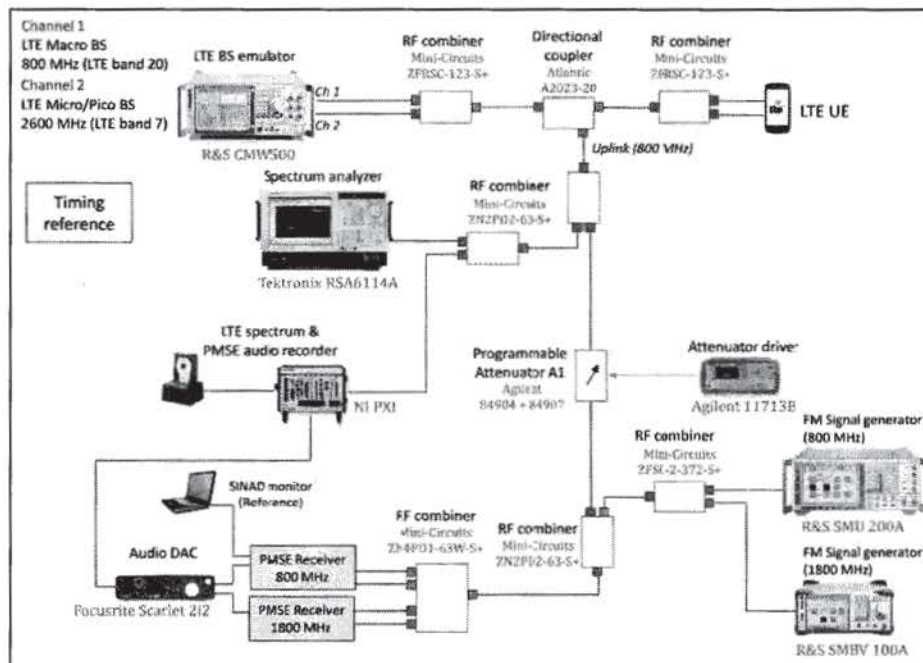


Figure 10: Test setup for dual-band analogue PMSE systems

Test automation and signal processing were done using National Instruments LabView.

Equipment tested

PMSE equipment

The following PMSE systems were tested:

Analogue (receiver only)

- AKG SR470
- Sennheiser EM3732-II
- Shure UR4D

Digital

- AKG DSR 700 + AKG digital transmitter
- Shure ULXD4Q + Shure digital transmitter

A fourth analogue PMSE receiver had technical issues and could therefore not be included in the measurements.

LTE user equipment

Seven commercially available LTE devices from major manufacturers were tested.

USB modems

- Huawei E3276
- ZTE 4G
- Vodafone
- Telekom (Huawei E398)

Smartphones

- LG E-975
- Sony Xperia Z
- Samsung Galaxy S4

Test Parameters

PMSE

The characteristics of the PMSE test signal were defined to match those used in previous measurement sessions, particularly the one conducted by the IRT [4]. Measurements were made at six carrier frequencies ranging from the edge to the centre of the duplex gap in steps of approx. 1 MHz. Because the set of frequencies had to be supported by all tested PMSE receivers the frequency spacing is not even.

- ▶ Carrier frequencies
 - 830.950 MHz
 - 830.100 MHz
 - 828.950 MHz
 - 827.950 MHz
 - 827.025 MHz
 - 825.925 MHz
- ▶ Deviation: 3 kHz (corresponding to a very 'silent' audio signal)
- ▶ Modulation: FM
- ▶ Modulation signal: 1 KHz sine wave

LTE

The CMW500 base station emulator used during the measurements featured two independent channels which were configured for operation the 800 MHz LTE band (band #20) and the 2.6 GHz band (band #7), resp. (Table 2).

CMW500 channel no.	1	2
Base station	Macro	Pico
LTE band	20	7
UL center frequency [MHz]	837	2535
Channel width [MHz]	10	10
Full cell bandwidth power [dBm]	-95	-42,2

Table 2: CMW500 basic configuration

In order to create a realistic scenario in which the macro BS DL signal experiences high attenuation due to distance and building loss the macro base station transmit power was set to a level significantly lower than that of the pico BS. At the same time LTE UE transmit (UL) power was maximised.

The uplink was configured to emulate a critical, and probably worst-case yet realistic scenario in which multiple LTE UE upload data to the network. The configuration (Figure 11) suggested by Technische Universitaet Braunschweig was used in the IRT measurements in June 2013.

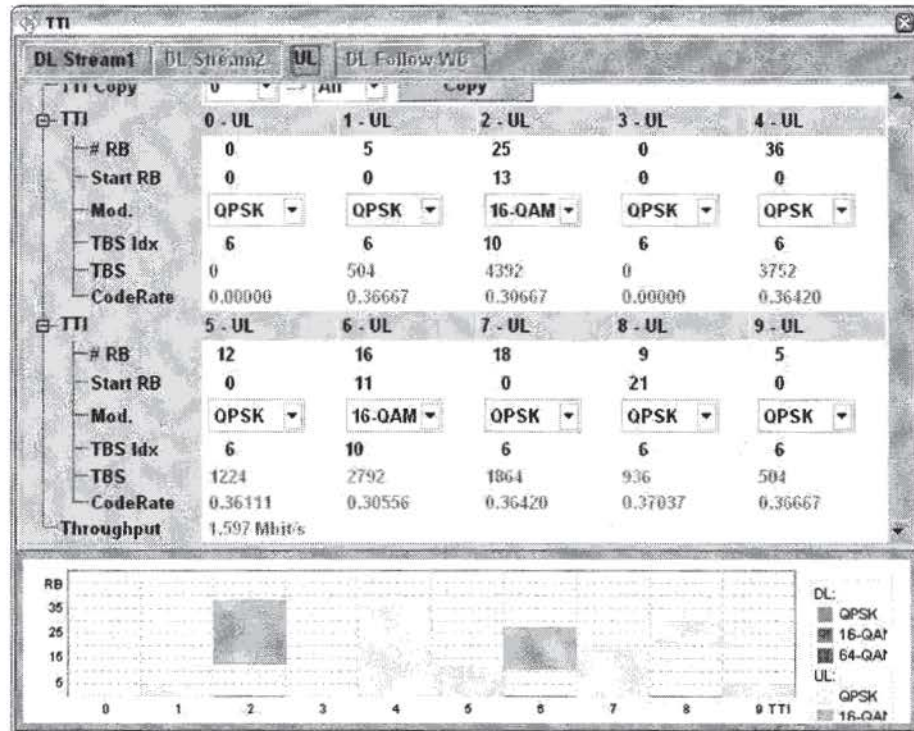


Figure 11: LTE uplink configuration

The duration of an LTE frame is 10 ms. One frame comprises 10 transmission time intervals (TTI) or subframes of 1 ms. For each TTI the number of resource blocks (RB), the position of the start RB, the modulation type, and the transport block size index (TBS Idx) can be configured. Each TTI was configured in a way that within one frame there was a combination of different modulations, resource blocks and offsets, and TBS indices. In addition, transmit power levels were varied according to the pattern shown in Figure 12.

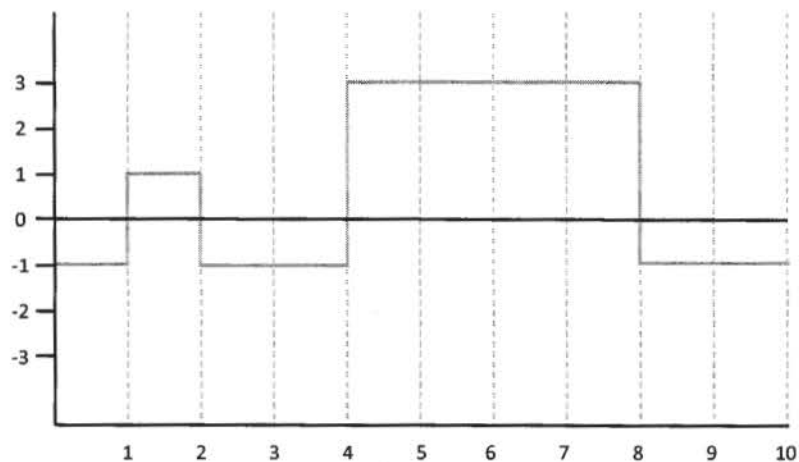


Figure 12: Uplink transmit power pattern

Measurements

In the first step, the transmit signal spectra of the various LTE UE were measured. The results were compared with those obtained in previous measurement campaigns and found to be consistent.

LTE UE uplink signal spectrum

The four tested USB modems produced OOB emissions of up to 30 dB above the noise level close to the LTE block edge, and up to 17 dB above the noise level and 827 MHz, 5 MHz below the LTE block edge. Between LTE devices, OOB emissions varied up to 10 dB.

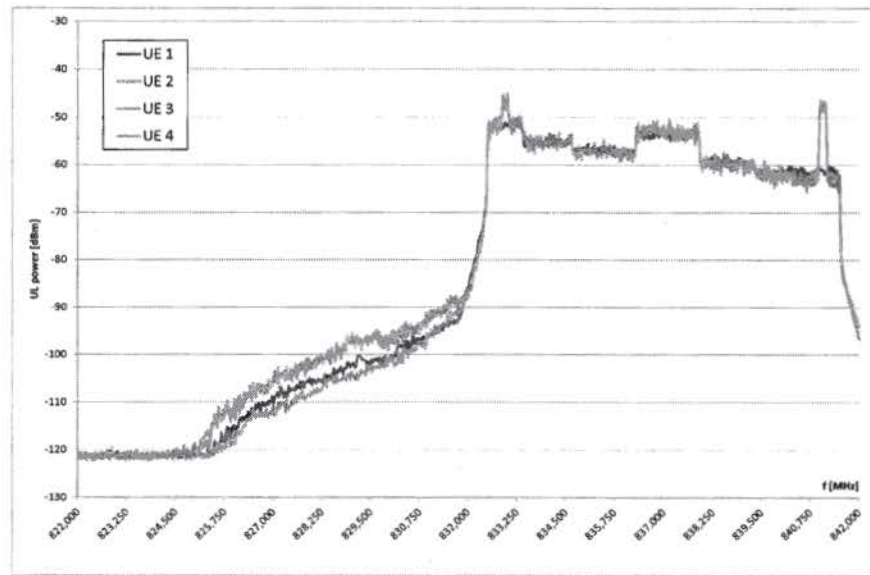


Figure 13: Comparison of the spectra and OOB emissions of the four tested LTE USB modems

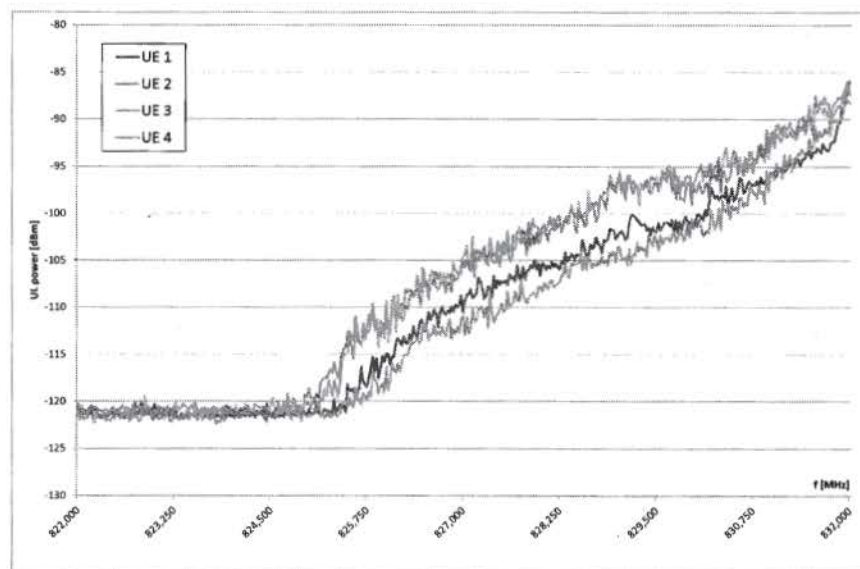


Figure 14: Comparison of the OOB emissions of the four tested LTE USB modems in the 822-832 MHz range

Two of the three tested smartphone showed similar OOB emission levels as the USB modems. Emissions of the third specimen were up to 10 dB lower.

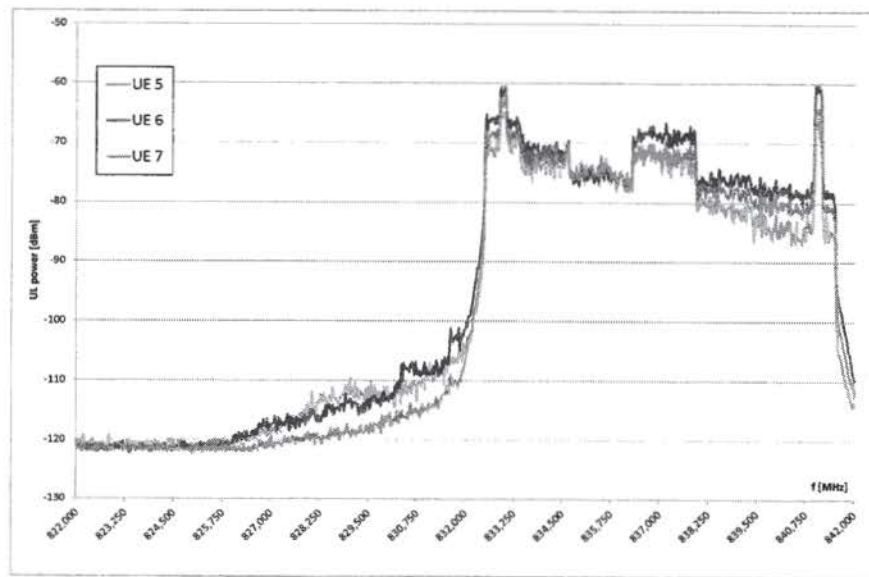


Figure 15: Comparison of the spectra and OOB emissions of the three tested LTE smartphones

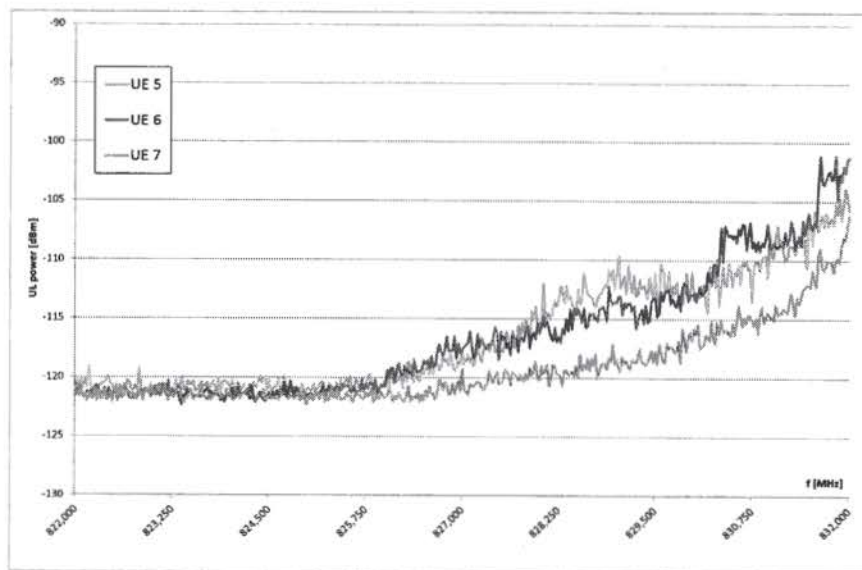


Figure 16: Comparison of the OOB emissions of the three tested LTE smartphones in the 822-832 MHz range

Note: In the smartphone measurements the dynamic range was reduced by 15 dB, compared to the USB modem measurements.

In-operation test

For the in-operation test the RF output power of the PMSE signal generator was adjusted so that for the analogue PMSE receivers an audio output SINAD of 30 dB was indicated by the ComTekk reference software. At this time the LTE signals were switched off. Depending on the receiver model sensitivity varied in the range of 8 dB (Table 3). For the two digital receivers matching digital transmitters had to be used whose RF signal levels were adjusted to obtain the nominal SINAD for 60 dB.

PMSE receiver model	PMSE receiver type	Sensitivity level [dBm]
A	Analogue	-101,8
B	Analogue	-94,3
C	Analogue	-102,3
D	Digital	-91,3
E	Digital	-92,3

Table 3: PMSE receiver sensitivity levels (30 dB SINAD)

According to ETSI [14] a SINAD of 30 dB constitutes the absolute minimum for professional applications. This assessment could be confirmed during the tests. At this SINAD level white noise and spikes (Figure 17) were observed which were audible as crackling and clicks. In a real operating scenario this low-level noise would be suppressed by the receivers' squelch function which was disabled during these measurements. As the determined SINAD value depends on the quality of the audio analogue to digital converter (ADC) the actual SINAD was even somewhat higher than 30 dB. Using identical test settings, SINAD values measured with the Focusrite Scarlet high-quality audio converter were 3 dB higher than those measured with the reference notebook PC.

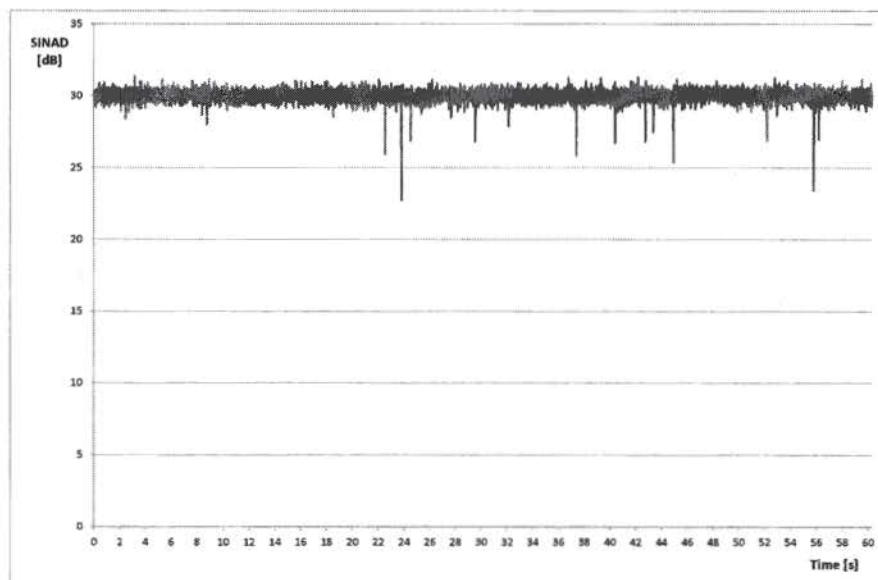


Figure 17: Analogue PMSE receiver audio output signal at 30 dB SINAD (resolution: 10 ms)

After the LTE macro BS and UE were switched on the overall attenuation between LTE UE and PMSE receiver was reduced from 102 dB to 42 dB in steps of 1 dB per second. In this way the movement of an LTE UE (or rather, multiple LTE UE, considering the UL signal pattern) towards the PMSE receiver was simulated. These parameters were calculated based on the ITU-R P.1238-7 non-line-of-sight (NLOS) path loss model [15] to simulate LTE UE approaching a PMSE receiver from a distance of 150 m down to 2 m, at an average speed of 2.4 m/s which corresponds to fast walking speed².

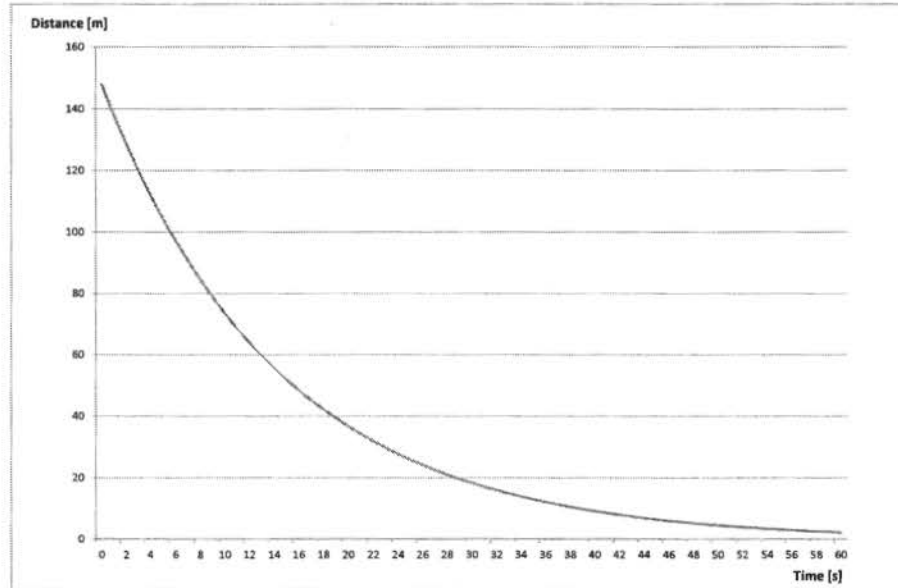


Figure 18: Simulated distance between LTE UE and PMSE receiver over time²

² The distance calculation is based on the ITU-R P.1238-7 indoor path loss model [12], office environment, transmitter and receiver located on the same floor